IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION CASE NO. 3:16-cv-00695-GCM

BARONIUS PRESS, LTD.,) DEFENDANT SAINT BENEDICT
Plaintiff,	PRESS, LLC'S FIRST SET OF INTERROGATORIES AND
v.	REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF
SAINT BENEDICT PRESS LLC,	BARONIUS PRESS, LTD.
Defendant.)

Defendant, Saint Benedict Press, LLC (hereinafter "Saint Benedict"), hereby submits the following First Set of Interrogatories and Requests for Production of Documents to be answered by Plaintiff Baronius Press, Ltd. (hereinafter "Baronius Press") in accordance with Rules 26, 33 and 34 of the Federal Rules of Civil Procedure.

INSTRUCTIONS

If any one or more of these Interrogatories or Requests for Production of Documents is/are objected to on the grounds of overbreadth, vagueness or similar ground, Plaintiff is instructed for each such Interrogatory or Request for Production of Documents to answer or respond to the Interrogatory or Request for Production of Document within the 30-day period as narrowed to conform with the objection. Where Plaintiff lacks knowledge of exact information responsive to an Interrogatory or Request for Production of Documents, Plaintiff is instructed to say so and to answer or respond to the Interrogatory or Request for Production of Documents to the best of its present knowledge, to supply the best available estimate of the requested information, and to explain the basis of the estimate. If any one or more of these Interrogatories or Requests for

12. Provide all Documents sent to, or received from, Verlag Herder or any representative of Verlag Herder, Relating to the English Work, the German Work, or Defendant.

RESPONSE:

13. Provide all Documents sent to, or received from, Dr. Robert Fastiggi Relating to the English Work, the German Work, or Defendant.

RESPONSE:

14. Provide all Documents sent to, or received from, any third party Relating to the English Work, the German Work, or Defendant.

RESPONSE:

15. Provide all Documents referenced in the documents produced by You and bates labeled BP00350 and BP00351.

RESPONSE:

16. Provide all correspondence between You and nova & vetera e.k. Relating to the English Work, the German Work or the Defendant.

RESPONSE:

17. Provide a copy of each edition of *Fundamentals of Catholic Dogma* or *Grundriß* der katholischen Dogmatik or any translation, or version, thereof published by You.

RESPONSE:

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **DEFENDANT SAINT BENEDICT PRESS**, **LLC'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF BARONIUS PRESS**, **LTD.** on Plaintiff by serving Plaintiff's counsel of record a copy of the same by email and regular U.S. Mail as outlined below:

Mark W. Ishman
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mishman@ishmanlaw.com
Attorney for Plaintiff

This the 13 day of October 2017.

Jonathan E. Buchan, N.C. State Bar No. 8205

Natalie D. Potter, N.C. State Bar No. 34574

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